

# Exhibit I

**From:** [Andrapalliyal, Vinita B. \(CIV\)](#)  
**To:** [McGinty, William \(ATG\)](#); [Daniel, Christian S. \(CIV\)](#); [Bombard, Robert \(CIV\)](#)  
**Cc:** [Heintz, Tera M. \(ATG\)](#); [Fraas, Lauryn \(ATG\)](#); [Sepe, Cristina \(ATG\)](#); [Hughes, Andrew \(ATG\)](#); [Luna, Neal \(ATG\)](#); [Wolf, Lucy \(ATG\)](#); [allie.m.boyd@doj.oregon.gov](#); [james.canaday@ag.state.mn.us](#); [shannon.stevenson@coag.gov](#); [Melody, Colleen M \(ATG\)](#); [Lauren Peach](#)  
**Subject:** RE: Washington et al. v. Trump et al. // Continuing PI Violations  
**Date:** Wednesday, April 30, 2025 9:01:52 AM

---

[EXTERNAL]

Counsel,

I'm writing to inform you that, per my understanding, the grants mentioned below have been reinstated.

Vinita

---

**From:** Andrapalliyal, Vinita B. (CIV)  
**Sent:** Monday, April 28, 2025 4:26 PM  
**To:** 'McGinty, William (ATG)' <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Daniel, Christian S. (CIV) <[Christian.S.Daniel@usdoj.gov](mailto:Christian.S.Daniel@usdoj.gov)>; Bombard, Robert (CIV) <[Robert.Bombard2@usdoj.gov](mailto:Robert.Bombard2@usdoj.gov)>  
**Cc:** Heintz, Tera M. (ATG) <[tera.heintz@atg.wa.gov](mailto:tera.heintz@atg.wa.gov)>; Fraas, Lauryn (ATG) <[Lauryn.Fraas@ATG.WA.GOV](mailto:Lauryn.Fraas@ATG.WA.GOV)>; Sepe, Cristina (ATG) <[cristina.sepe@atg.wa.gov](mailto:cristina.sepe@atg.wa.gov)>; Hughes, Andrew (ATG) <[andrew.hughes@atg.wa.gov](mailto:andrew.hughes@atg.wa.gov)>; Luna, Neal (ATG) <[neal.luna@atg.wa.gov](mailto:neal.luna@atg.wa.gov)>; Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; [allie.m.boyd@doj.oregon.gov](mailto:allie.m.boyd@doj.oregon.gov); [james.canaday@ag.state.mn.us](mailto:james.canaday@ag.state.mn.us); [shannon.stevenson@coag.gov](mailto:shannon.stevenson@coag.gov); Melody, Colleen M (ATG) <[colleen.melody@atg.wa.gov](mailto:colleen.melody@atg.wa.gov)>; Lauren Peach <[Lauren.Peach@coag.gov](mailto:Lauren.Peach@coag.gov)>  
**Subject:** RE: Washington et al. v. Trump et al. // Continuing PI Violations

William,

Defendants remain in compliance with the court's preliminary injunction. It is Defendants' position that the actions taken on the grants below did not enforce the challenged sections of the EOs to condition or withhold federal funding based on the fact that a health care entity or health professional provides gender-affirming care within the Plaintiff States. In any event, I understand that NIH will be reinstating those grants shortly. I will provide details on timing when I have them.

Vinita

---

**From:** McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>  
**Sent:** Monday, April 28, 2025 2:56 PM  
**To:** Andrapalliyal, Vinita B. (CIV) <[Vinita.B.Andrapalliyal@usdoj.gov](mailto:Vinita.B.Andrapalliyal@usdoj.gov)>; Daniel, Christian S. (CIV) <[Christian.S.Daniel@usdoj.gov](mailto:Christian.S.Daniel@usdoj.gov)>; Bombard, Robert (CIV) <[Robert.Bombard2@usdoj.gov](mailto:Robert.Bombard2@usdoj.gov)>  
**Cc:** Heintz, Tera M. (ATG) <[tera.heintz@atg.wa.gov](mailto:tera.heintz@atg.wa.gov)>; Fraas, Lauryn (ATG) <[Lauryn.Fraas@ATG.WA.GOV](mailto:Lauryn.Fraas@ATG.WA.GOV)>; Sepe, Cristina (ATG) <[cristina.sepe@atg.wa.gov](mailto:cristina.sepe@atg.wa.gov)>; Hughes, Andrew (ATG) <[andrew.hughes@atg.wa.gov](mailto:andrew.hughes@atg.wa.gov)>; Luna, Neal (ATG) <[neal.luna@atg.wa.gov](mailto:neal.luna@atg.wa.gov)>; Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; [allie.m.boyd@doj.oregon.gov](mailto:allie.m.boyd@doj.oregon.gov); [james.canaday@ag.state.mn.us](mailto:james.canaday@ag.state.mn.us);

[shannon.stevenson@coag.gov](mailto:shannon.stevenson@coag.gov); Melody, Colleen M (ATG) <[colleen.melody@atg.wa.gov](mailto:colleen.melody@atg.wa.gov)>; Lauren Peach <[Lauren.Peach@coag.gov](mailto:Lauren.Peach@coag.gov)>

**Subject:** [EXTERNAL] RE: Washington et al. v. Trump et al. // Continuing PI Violations

Vinita,

Do you have an update regarding the two Colorado grants mentioned below?

That is:

Grant No. [5R34DA058191-02](#) to Dr. Sun at the University of Colorado Denver

Grant No. [5R00MD015770-04](#) to Dr. Simone at University of Colorado Denver

Regards,

William McGinty (he, him)  
Deputy Solicitor General  
PO Box 40100  
Olympia, WA 98504-010  
360-709-6027

This email and any files transmitted with it are intended solely for the use of the individual(s) or entity to which they are addressed, and may contain confidential and/or privileged information. If you received this e-mail in error, please notify the sender and delete the message. Please be advised that any use of it is strictly prohibited.

---

**From:** Andrapalliyal, Vinita B. (CIV) <[Vinita.B.Andrapalliyal@usdoj.gov](mailto:Vinita.B.Andrapalliyal@usdoj.gov)>

**Sent:** Tuesday, April 22, 2025 2:19 PM

**To:** McGinty, William (ATG) <[william.mcginity@atg.wa.gov](mailto:william.mcginity@atg.wa.gov)>; Daniel, Christian S. (CIV) <[Christian.S.Daniel@usdoj.gov](mailto:Christian.S.Daniel@usdoj.gov)>; Bombard, Robert (CIV) <[Robert.Bombard2@usdoj.gov](mailto:Robert.Bombard2@usdoj.gov)>

**Cc:** Heintz, Tera M. (ATG) <[tera.heintz@atg.wa.gov](mailto:tera.heintz@atg.wa.gov)>; Fraas, Lauryn (ATG) <[Lauryn.Fraas@ATG.WA.GOV](mailto:Lauryn.Fraas@ATG.WA.GOV)>; Sepe, Cristina (ATG) <[cristina.sepe@atg.wa.gov](mailto:cristina.sepe@atg.wa.gov)>; Hughes, Andrew (ATG) <[andrew.hughes@atg.wa.gov](mailto:andrew.hughes@atg.wa.gov)>; Luna, Neal (ATG) <[neal.luna@atg.wa.gov](mailto:neal.luna@atg.wa.gov)>; Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; [allie.m.boyd@doj.oregon.gov](mailto:allie.m.boyd@doj.oregon.gov); [james.canaday@ag.state.mn.us](mailto:james.canaday@ag.state.mn.us); [shannon.stevenson@coag.gov](mailto:shannon.stevenson@coag.gov); Melody, Colleen M (ATG) <[colleen.melody@atg.wa.gov](mailto:colleen.melody@atg.wa.gov)>; Lauren Peach <[Lauren.Peach@coag.gov](mailto:Lauren.Peach@coag.gov)>

**Subject:** Re: Washington et al. v. Trump et al. // Continuing PI Violations

[EXTERNAL]

Will,

I understand that payment for year 3 has been released for the below grant.

Vinita

On Apr 21, 2025, at 4:57 PM, Andrapalliyal, Vinita B. (CIV)  
<[Vinita.B.Andrapalliyal@usdoj.gov](mailto:Vinita.B.Andrapalliyal@usdoj.gov)> wrote:

Will,

Defendants reiterate that they remain in compliance with the court's preliminary injunction. In any event, I understand that year-3 funding for Grant No. 5K08HS029028-02 is forthcoming. I will pass along details on timing once I have them.

We are looking into the two Colorado grants mentioned below and will be in touch once we have an update.

Vinita

---

**From:** McGinty, William (ATG) <[william.mcginity@atg.wa.gov](mailto:william.mcginity@atg.wa.gov)>  
**Sent:** Friday, April 18, 2025 7:11 PM  
**To:** Andrapalliyal, Vinita B. (CIV) <[Vinita.B.Andrapalliyal@usdoj.gov](mailto:Vinita.B.Andrapalliyal@usdoj.gov)>; Daniel, Christian S. (CIV) <[Christian.S.Daniel@usdoj.gov](mailto:Christian.S.Daniel@usdoj.gov)>; Bombard, Robert (CIV) <[Robert.Bombard2@usdoj.gov](mailto:Robert.Bombard2@usdoj.gov)>  
**Cc:** Heintz, Tera M. (ATG) <[tera.heintz@atg.wa.gov](mailto:tera.heintz@atg.wa.gov)>; Fraas, Lauryn (ATG) <[Lauryn.Fraas@ATG.WA.GOV](mailto:Lauryn.Fraas@ATG.WA.GOV)>; Sepe, Cristina (ATG) <[cristina.sepe@atg.wa.gov](mailto:cristina.sepe@atg.wa.gov)>; Hughes, Andrew (ATG) <[andrew.hughes@atg.wa.gov](mailto:andrew.hughes@atg.wa.gov)>; Luna, Neal (ATG) <[neal.luna@atg.wa.gov](mailto:neal.luna@atg.wa.gov)>; Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; 'Allie.M.Boyd@doj.oregon.gov' <[Allie.M.Boyd@doj.oregon.gov](mailto:Allie.M.Boyd@doj.oregon.gov)>; 'James.Canaday@ag.state.mn.us' <[James.Canaday@ag.state.mn.us](mailto:James.Canaday@ag.state.mn.us)>; 'shannon.stevenson@coag.gov' <[shannon.stevenson@coag.gov](mailto:shannon.stevenson@coag.gov)>; Melody, Colleen M (ATG) <[colleen.melody@atg.wa.gov](mailto:colleen.melody@atg.wa.gov)>; Lauren Peach (she/her) <[Lauren.Peach@coag.gov](mailto:Lauren.Peach@coag.gov)>  
**Subject:** [EXTERNAL] RE: Washington et al. v. Trump et al. // Continuing PI Violations

Vinita,

Thank you for this information.

With respect to Grant No. 5K08HS029028-02, while it has not been formally terminated in a letter or other communication, funding continues to be withheld unlawfully. Please provide us with your client's position no later than Monday, April 21 about whether the NIH will comply with the preliminary injunction by permitting disbursements to fund Dr. Sequeira's research, or, in the alternative, your client's position on a motion to enforce the preliminary injunction.

Additionally, after we sent our conferral, Colorado identified additional grants that NIH should reinstate to avoid violating the court's orders:

Grant No. [5R34DA058191-02](#) to Dr. Sun at the University of Colorado Denver

Grant No. [5R00MD015770-04](#) to Dr. Simone at University of Colorado Denver

Regards,

William McGinty (he, him)  
Deputy Solicitor General  
PO Box 40100  
Olympia, WA 98504-010  
360-709-6027

This email and any files transmitted with it are intended solely for the use of the individual(s) or entity to which they are addressed, and may contain confidential and/or privileged information. If you received this e-mail in error, please notify the sender and delete the message. Please be advised that any use of it is strictly prohibited.

---

**From:** Andrapalliyal, Vinita B. (CIV) <[Vinita.B.Andrapalliyal@usdoj.gov](mailto:Vinita.B.Andrapalliyal@usdoj.gov)>  
**Sent:** Friday, April 18, 2025 1:07 PM  
**To:** McGinty, William (ATG) <[william.mcginity@atg.wa.gov](mailto:william.mcginity@atg.wa.gov)>; Daniel, Christian S. (CIV) <[Christian.S.Daniel@usdoj.gov](mailto:Christian.S.Daniel@usdoj.gov)>; Bombard, Robert (CIV) <[Robert.Bombard2@usdoj.gov](mailto:Robert.Bombard2@usdoj.gov)>  
**Cc:** Heintz, Tera M. (ATG) <[tera.heintz@atg.wa.gov](mailto:tera.heintz@atg.wa.gov)>; Fraas, Lauryn (ATG) <[Lauryn.Fraas@ATG.WA.GOV](mailto:Lauryn.Fraas@ATG.WA.GOV)>; Sepe, Cristina (ATG) <[cristina.sepe@atg.wa.gov](mailto:cristina.sepe@atg.wa.gov)>; Hughes, Andrew (ATG) <[andrew.hughes@atg.wa.gov](mailto:andrew.hughes@atg.wa.gov)>; Luna, Neal (ATG) <[neal.luna@atg.wa.gov](mailto:neal.luna@atg.wa.gov)>; Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; 'Allie.M.Boyd@doj.oregon.gov' <[Allie.M.Boyd@doj.oregon.gov](mailto:Allie.M.Boyd@doj.oregon.gov)>; 'James.Canaday@ag.state.mn.us' <[James.Canaday@ag.state.mn.us](mailto:James.Canaday@ag.state.mn.us)>; 'shannon.stevenson@coag.gov' <[shannon.stevenson@coag.gov](mailto:shannon.stevenson@coag.gov)>; Melody, Colleen M (ATG) <[colleen.melody@atg.wa.gov](mailto:colleen.melody@atg.wa.gov)>; Lauren Peach (she/her) <[Lauren.Peach@coag.gov](mailto:Lauren.Peach@coag.gov)>  
**Subject:** RE: Washington et al. v. Trump et al. // Continuing PI Violations

[EXTERNAL]

William,

Defendants remain in compliance with the court's preliminary injunction. It is Defendants' position that the actions taken on the grants below did not enforce the challenged sections of the EOs to condition or withhold federal funding based on the fact that a health care entity or health professional provides gender-affirming care within the Plaintiff States.

In any event, NIH has reinstated the terminated grants mentioned below. [Grant No. 5Ko8HS029028-02](#), administered by the Agency for Healthcare Research and Quality (AHRQ), was not terminated. We are still looking into that grant, and additional information regarding year-3 funding for the grant will be forthcoming.

Have a nice weekend,  
Vinita

---

**From:** McGinty, William (ATG) <[william.mcginity@atg.wa.gov](mailto:william.mcginity@atg.wa.gov)>  
**Sent:** Friday, April 11, 2025 4:57 PM  
**To:** Daniel, Christian S. (CIV) <[Christian.S.Daniel@usdoj.gov](mailto:Christian.S.Daniel@usdoj.gov)>; Bombard, Robert (CIV) <[Robert.Bombard2@usdoj.gov](mailto:Robert.Bombard2@usdoj.gov)>; Andrapalliyal, Vinita B. (CIV) <[Vinita.B.Andrapalliyal@usdoj.gov](mailto:Vinita.B.Andrapalliyal@usdoj.gov)>  
**Cc:** Heintz, Tera M. (ATG) <[tera.heintz@atg.wa.gov](mailto:tera.heintz@atg.wa.gov)>; Fraas, Lauryn (ATG) <[Lauryn.Fraas@ATG.WA.GOV](mailto:Lauryn.Fraas@ATG.WA.GOV)>; Sepe, Cristina (ATG) <[cristina.sepe@atg.wa.gov](mailto:cristina.sepe@atg.wa.gov)>; Hughes, Andrew (ATG) <[andrew.hughes@atg.wa.gov](mailto:andrew.hughes@atg.wa.gov)>; Luna, Neal (ATG) <[neal.luna@atg.wa.gov](mailto:neal.luna@atg.wa.gov)>; Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; 'Allie.M.Boyd@doj.oregon.gov' <[Allie.M.Boyd@doj.oregon.gov](mailto:Allie.M.Boyd@doj.oregon.gov)>; 'James.Canaday@ag.state.mn.us' <[James.Canaday@ag.state.mn.us](mailto:James.Canaday@ag.state.mn.us)>; 'shannon.stevenson@coag.gov' <[shannon.stevenson@coag.gov](mailto:shannon.stevenson@coag.gov)>; Melody, Colleen M (ATG) <[colleen.melody@atg.wa.gov](mailto:colleen.melody@atg.wa.gov)>; Lauren Peach (she/her) <[Lauren.Peach@coag.gov](mailto:Lauren.Peach@coag.gov)>  
**Subject:** [EXTERNAL] Washington et al. v. Trump et al. // Continuing PI Violations

Counsel,

We are writing regarding additional grants that appear to have been terminated or withheld in violation of Judge King's preliminary injunction order. See Dkt. #233 at 54 (enjoining Defendants "from enforcing Sections 3(e) or 3(g) of Executive Order 14,168 to condition or withhold federal funding based on the fact that a health care entity or health professional provides gender-affirming care within the Plaintiff States."). Specifically, they are:

[Grant No. 2R01HD094081-06A1](#) to Dr. Claire Kamp Dush at the University of Minnesota;  
[Grant No. 5U01HD108779-04](#) to Dr. Claire Kamp Dush at the University of Minnesota;  
[Grant No. 1R21MH132421-02](#) to Dr. Christine Tagliaferri Rael, University of Colorado Denver;  
[Grant No. 1R21 MH135779-01A1](#) to Dr. Christine Tagliaferri Rael, University of Colorado Denver;  
[Grant No. 5K23NS130143-02](#) to Dr. Jennifer Hranilovich, University of Colorado Denver; and  
[Grant No. 5K08HS029028-02](#) to Dr. Gina Sequeira at Seattle Children's Hospital.

Please confirm that these grants will each be reinstated and/or funding disbursed pursuant to the original grant terms by April 18, 2025. If we do not receive such confirmation, we will pursue formal legal options.

Regards,

William McGinty (he, him)

Deputy Solicitor General  
PO Box 40100  
Olympia, WA 98504-010  
360-709-6027

This email and any files transmitted with it are intended solely for the use of the individual(s) or entity to which they are addressed, and may contain confidential and/or privileged information. If you received this e-mail in error, please notify the sender and delete the message. Please be advised that any use of it is strictly prohibited.